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P. Gill Obstetrics & Gynecology Medical Group, Inc.;  
Parampal K. Gill, M.D.; Jasbir S. Gill, M.D.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA AND STATE  
OF CALIFORNIA ex rel. GAIL JOSEPH, M.D.,

Plaintiff,

v.

P. GILL OBSTETRICS & GYNECOLOGY  
MEDICAL GROUP, INC., a California  
professional corporation; PARAMPAL K. GILL,  
M.D., an individual; JASBIR S. GILL, M.D., an  
individual,

Defendants.

Case No. 2:21-cv-0554-KJM-AC

STIPULATION TO EXTEND MOTION  
TO DISMISS SCHEDULE AND ALL  
OTHER DEADLINES

1 This stipulation (“Stipulation”) is entered into by and among Relator GAIL JOSEPH, M.D.  
2 and Defendants P. GILL OBSTETRICS & GYNECOLOGY MEDICAL GROUP, INC.;  
3 PARAMPAL K. GILL, M.D.; JASBIR S. GILL, M.D. (jointly, “Defendants”) (collectively  
4 “Parties”), through their respective counsel.

5 **Recitals**

6 1. On April 15, 2022 (ECF No. 20), Defendants filed their Motion to Dismiss and set  
7 a Motion Hearing for May 27, 2022.

8 2. In light of meet and confer involving potential early resolution and Defendants  
9 investigation into the allegations in the Complaint, among other things, the Parties stipulated to  
10 continue the hearing date for Defendants’ Motion to Dismiss, the briefing schedule on the Motion  
11 to Dismiss, the joint status conference, the FRCP 26(f) conference, and the date to file a joint status  
12 report. The Court entered this stipulation on May 5, 2022. ECF No. 24.

13 3. Since the Court’s entry of the May 5, 2022, stipulation, Defendants have hired an  
14 outside contractor who has made substantial progress in an internal investigation. Defendants and  
15 Relator have been discussing terms appropriate for the protected disclosure of work product and  
16 need to reduce terms to writing and reach agreement. At that point, Defendants would then need to  
17 disclose said work product, and Relator would need to evaluate it. Then, the Parties and government  
18 would need to negotiate.

19 4. In the context of facts, regulatory, statutory, and decisional law related to health care,  
20 it would promote party efficiency and judicial economy for the Parties to continue to work towards  
21 possible case resolution rather than litigation of a motion that would be obviated if the Parties can  
22 settle.

23 5. In addition, to the extent that the Parties would continue to litigate the Motion to  
24 Dismiss, the United States’ filing of a Statement of Interest Regarding Defendants’ Motion to  
25 Dismiss (ECF No. 26) is a development that Defendants wish to evaluate further.  
26  
27  
28

1 THEREFORE:

2 **IT IS STIPULATED:**

- 3 1. The August 19, 2022, hearing date for Defendant's Motion to Dismiss is vacated and  
4 reset to September 30, 2022, at 10:00 a.m. Defendants' reply to Plaintiff's Opposition  
5 to the Motion to Dismiss shall be filed by or on August 29, 2022.
- 6 2. The joint status conference, currently set for September 9, 2022, is extended and shall  
7 be held on October 20, 2022.
- 8 3. The deadline for the Parties to engage in the FRCP 26(f) conference shall be extended  
9 to September 29, 2022.
- 10 4. The deadline for the Parties to file a joint status conference report with the Court shall  
11 be extended to on or before October 6, 2022.

12  
13 Dated: July 15, 2022

STOEL RIVES LLP

14 By: /s/ Nicholas D. Karkazis  
15 MATTHEW D. SEGAL  
16 NICHOLAS D. KARKAZIS  
17 Attorneys for Defendants  
18 P. Gill Obstetrics & Gynecology Medical  
Group, Inc.; Parampal K. Gill, M.D.;  
Jasbir S. Gill, M.D.

19 Dated: July 15, 2022

THE BRINEGAR LAW FIRM

20 By: /s/ Matthew Brinegar  
21 MATTHEW BRINEGAR  
22 Attorneys for Relator/Plaintiff  
23 Gail Joseph, M.D.  
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**ORDER**

The court has reviewed the parties' stipulation, and good cause appearing, hereby

**ORDERS:**

1. The August 19, 2022, hearing date for Defendant's Motion to Dismiss is vacated and reset to October 21, 2022, at 10:00 a.m. Defendants' reply to Plaintiff's Opposition to the Motion to Dismiss shall be filed by or on August 29, 2022.
2. The joint status conference, currently set for September 9, 2022, is extended and shall be held on December 1, 2022.
3. The deadline for the Parties to engage in the FRCP 26(f) conference shall be extended to November 10, 2022.
4. The deadline for the Parties to file a joint status conference report with the Court shall be extended to on or before November 17, 2022.

DATED: August 2, 2022.

  
CHIEF UNITED STATES DISTRICT JUDGE